



NATIONAL ASSOCIATION OF THE DEAF

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August 12, 2002

Marlene H. Dortch
Office of the Secretary
Room TW-A325
Federal Communications Commission
445 Twelfth Street SW
Washington, DC 20554

Re: CC Docket 98-67
Petition for Clarification - CapTel

Dear Ms. Dortch:

The National Association of the Deaf (NAD) appreciates this opportunity to submit comments on Ultratec's "Petition for Clarification, Provision of and Cost Recovery for CapTel, an Enhanced VCO Service," which was recently filed with the Commission.

Established in 1880, the NAD is the nation's oldest and largest consumer-based national advocacy organization safeguarding the civil and accessibility rights of deaf and hard of hearing individuals in the United States. Among the broad array of issues the NAD addresses, the area of telecommunications services and technologies are of particular interest. We recently supported publication of "Broadband and Americans with Disabilities" by New Millennium Research (<http://www.newmillenniumresearch.org/disability.pdf>).

CapTel (Captioned Telephone) users place a call in the same way as dialing a traditional phone. As they dial, the CapTel automatically connects to a captioning service. When the other party answers, the CapTel user hears everything that they say, just like a traditional call. Participants were able to see hands-on demonstrations of CapTel as well as try it out themselves at the Ultratec exhibit booth during the recent Biennial NAD Conference in Washington, DC.

The NAD strongly recommends that the FCC accept CapTel as an enhanced voice carryover (VCO) service. We believe that the device with its captioning service is a good example of the kinds of advancements that the Commission had in mind when it called for innovations in relay services.

Now in usage by more than 100 consumers in Wisconsin and Maryland, the service features speech-recognition software and a communication assistant (CA) who improves the software-generated speech-to-text translation. As described in Ultratec's filing, the service operates in this

way: The CapTel user dials the number of the party he or she wishes to reach (not a TRS number). The CA silently and seamlessly comes on the line; this CA re-voices to the CapTel what the party being called is saying. This re-voicing then generates the captioned text that appears on the CapTel user's phone display. The result is near-instant captioning of speech. The CapTel user then speaks directly to the party being called.

According to Ultratec, CA speeds of up to 140 words per minute have been achieved. To place that number into context, consider that conversational speech is usually said to be at 160 words per minute. Because CapTel is much faster and more interactive than is traditional TRS, it is especially suited for handling of interactive menus. Repeated dialing as is often the case with traditional TRS is not required. Callers may press the desired interactive menu numbers themselves rather than having the CA to do so on their behalf, as would be the case via traditional relay services.

Again, the NAD strongly encourages FCC consideration for any and all new or enhanced products and services that enhance overall telecommunications accessibility for deaf and hard of hearing consumers. Delegates at our recent biennial national conference consider CapTel to be worthy of FCC attention and action, as an enhanced voice carryover (VCO) service.

Sincerely,

A handwritten signature in black ink that reads "Nancy J. Bloch". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Nancy J. Bloch
Executive Director